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7 *Attorneys for Defendant Specialized  
8 Loan Servicing, LLC d/b/a SLS*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 THOMAS R. LAYTON, an individual

12 Plaintiff,

13 v.

14 SPECIALIZED LOAN SERVICING, LLC, a  
15 Delaware limited liability company d/b/a SLS,

16 Defendant.

Case No. 2:20-cv-01225-CDS-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR DEFENDANT  
SPECIALIZED LOAN SERVICING, LLC  
TO FILE ANSWER TO PLAINTIFF'S  
FIRST AMENDED COMPLAINT**

**[SECOND REQUEST]**

18 Defendant Specialized Loan Servicing LLC ("SLS") and Plaintiff Thomas R. Layton  
19 ("Plaintiff"), by and through their undersigned counsel of record, hereby stipulate and agree as  
20 follows:

21 1. Plaintiff filed a putative Class Action Complaint ("Complaint") against SLS in the  
22 Eighth Judicial District Court for the State of Nevada in the above-captioned action on May 27, 2020.

23 2. Plaintiff served the Complaint on SLS on May 29, 2020.

24 3. On June 29, 2020, SLS removed the matter to this Court pursuant to the 28 U.S.C. §  
25 1441 and 28 U.S.C. § 1332(d).

26 4. The Court later continued SLS's deadline to respond to the Complaint to September 29,  
27 2020 and then November 30, 2020, and finally to January 29, 2021 by virtue of the Court's Order  
28 granting the Parties' Stipulation and Order to Extend Deadline for Defendant to File Responsive

1 Pleading to Plaintiff's Complaint (Second Request) (ECF No. 7), the Parties' Stipulation and Order to  
 2 Extend Deadline for Defendant to File Responsive Pleading to Plaintiff's Complaint (Third Request)  
 3 (ECF No. 12), and the Parties' Stipulation and Order to Extend Deadline for Defendant to File  
 4 Responsive Pleading to Plaintiff's Complaint (Fourth Request) (ECF No. 14). The Court entered orders  
 5 granting the Parties' stipulations based on, among other things, ongoing settlement efforts and a family  
 6 emergency for Plaintiff's counsel requiring her immediate attention.

7       5. SLS filed its Motion to Strike Class Allegations (ECF No. 21) in response to Plaintiff's  
 8 Complaint on January 29, 2021.

9       6. On March 1, 2021, Plaintiff filed the First Amended Complaint (ECF No. 27).

10      7. The Court entered an order granting the Parties' Stipulation and Order to Extend  
 11 Deadline for Defendant to File Responsive Pleading to Plaintiff's First Amended Complaint (First  
 12 Request) (ECF No. 30) on March 10, 2021.

13      8. On April 15, 2021, SLS filed its Motion to Strike Class Allegations (the "Motion") (ECF  
 14 No. 31).

15      9. After the Parties completed briefing on the Motion, the Court took the matter under  
 16 submission and entered its Order Denying Motion to Strike Class Allegations ("Order") (ECF No.  
 17 34) on March 28, 2022 denying the Motion and ordering the Parties to submit a proposed scheduling  
 18 order.

19      10. Per the Court's Order, the Parties conferred on a proposed schedule pursuant to Fed. R.  
 20 Civ. P. 26(f) on April 8, at which time the Parties also conferred on SLS's request to extend the deadline  
 21 to file an answer due to client and counsel availability to prepare an appropriate response. Pursuant to  
 22 that discussion, the Parties agreed to extend SLS's deadline to respond to the First Amended Complaint  
 23 up to and through April 25, 2022. The First Amended Complaint includes over fifty (50) paragraphs of  
 24 allegations, including class allegations regarding Nevada and nationwide classes that SLS contends  
 25 implicate a broad swathe of additional defenses that require consideration. As such, SLS requires a  
 26 short amount of additional time to evaluate and prepare its answer,

27      11. This request is made in good faith and not for the purpose of delay. Rather, the Parties  
 28 believe that the requested continuance will further the interests of efficiency and judicial economy by

1 providing a short extension to allow SLS adequate time to prepare and file its answer and allow the  
2 Parties to proceed efficiently with the remainder of this dispute.

3 THEREFORE, and for good cause shown, the Parties respectfully request that the deadline for  
4 SLS to file a response to the First Amended Complaint be extended up to and including **April 25, 2022**.

5 IT IS SO STIPULATED

6 DATED this 14<sup>th</sup> day of April, 2022.

7 GREENBERG TRAURIG, LLP

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14 *Counsel for Specialized Loan Servicing LLC*

5 DATED this 14<sup>th</sup> day of April, 2022.

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21 **ORDER**

22 **IT IS SO ORDERED:**

23   
24 CLAYTON J. ZOUCHAL  
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: April 14th, 2022